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*Attorneys for Plaintiff
Bluestone Innovations LLC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BLUESTONE INNOVATIONS LLC,

Plaintiff,

v.

ACE HARDWARE CORPORATION,

Defendant.

Case No. 3:15-CV-05486-SI

**JOINT MOTION TO STAY ALL
DEADLINES UNTIL JUNE 6, 2016**

JOINT MOTION TO STAY ALL DEADLINES UNTIL JUNE 6, 2016

Plaintiff Bluestone Innovations LLC (“Bluestone”) and Defendant Ace Hardware Corporation (“Ace”), by and through their respective attorneys, file this Joint Motion to Stay All Deadlines through June 6, 2016.

The Court recently granted the parties Joint Motion to Stay All Deadlines, Except the CMC Deadline, Until May 20, 2016 (D.I. 39). At that time, the parties had reached agreement in principle, but still had certain details to finalize. The parties have now reached agreement in full, but, despite diligent efforts, have not yet executed the agreement or completed other obligations

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UNTIL JUNE 6, 2016
CASE NO. 3:15-CV-05486

1 called for in the agreement as precursors to dismissal of the case. Ace's answer or other response
2 is due on May 20, 2016. The parties will require additional days to execute the agreement and
3 fulfill other obligations recited therein and, therefore, jointly request that the Court stay all
4 pending deadlines until June 6, 2016.

5 For the foregoing reasons, the parties jointly move to stay all deadlines until and through
6 June 6, 2016. The requested stay is not intended as a means of delay but, instead, for conserving
7 the Court's and the parties' time and respective resources.

8
9 Dated: May 20, 2016

DENTONS US LLP

10
11 By: /s/ Mark C. Nelson

Mark C. Nelson

12 Attorney for Defendant
13 ACE HARDWARE CORPORATION

14 NI, WANG & MASSAND, PLLC

15
16 By: /s/ Hao Ni

17 HAO NI

18 Attorney for Plaintiff
19 BLUESTONE INNOVATIONS LLC

CERTIFICATE OF SERVICE

I, Nell Butler, hereby declare:

I am employed in the City and County of Dallas, Texas in the office of a member of the bar of this court whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Dentons US LLP, 2000 McKinney Avenue, Suite 1900, Dallas, Texas, 75201.

On May 20, 2016, I caused the following documents, described as:

JOINT MOTION TO STAY ALL DEADLINES UNTIL JUNE 6, 2016

to be served via CM/ECF by the Clerk of the Court, upon all counsel of record registered to receive electronic filing, as indicated on the Court's website.

I declare under penalty of perjury that the above is true and correct. Executed on May 20, 2016, in Dallas, Texas.

/s/ Nell Butler

Nell Butler

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